

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

**IN RE  
NATALIE TAO  
DEBTOR**

**BANKRUPTCY NO. 19-18681**

**LAKESIDE NATIONAL, LLC  
MOVANT**

**VS.** **CHAPTER 13**

**NATALIE TAO  
ROBERT S. THOMAS, II, TRUSTEE**

**RESPONDENT(S)**

**AFFIDAVIT OF DEFAULT**

Now comes Lakeside National, LLC through Gerard F. Miles, Jr., and Huesman, Jones and Miles, and hereby files this affidavit of default and for reasons states:

Wherefore, by Consent Order entered August 7, 2019, (Docket 15) the automatic stay was lifted as to the real property known as 873-875 N. Howard Street, Baltimore Maryland. The creditor agreed to forbear from exercising any rights with regard to the property so long as Debtor, Natalie Tao, inter alia, paid \$5,000 per month on the first of every month, with a five day grace period; and

Wherefore, if the debtor failed to make any payments under this agreement, Creditor was required to mail a notice of default to the Debtor, with copies to counsel for the Debtor; and

Wherefore, if the default was not cured within seven days of this notice being sent, the agreement by the Debtor to forbear was null and void, and the Creditor was entitled to pursue its state court remedies; and

Wherefore, after the November payment had not been received, on November 6, 2019, notice of default was sent. **Exhibit 1**; and

Wherefore, no payment has been received;

Therefore, Lakeside National, LLC is hereby affirming that the terms of the Consent Order have not been followed by the Debtor and Lakeside National, LLC is within its rights to pursue foreclosure and intends to do so.

I hereby affirm under the penalties of perjury that the contents off the foregoing paper are true to the best of my knowledge, information and belief.

/s/ Russell Frost  
Russell Frost, Managing Member  
Lakeside National, LLC

Respectfully Submitted,  
Huesman, Jones and Miles, LLC

By: /s/ Gerard F. Miles, Jr.  
Gerard F. Miles, Jr.  
Federal Bar No. 28199  
Executive Plaza III, Suite 905  
11350 McCormick Road  
Hunt Valley, Maryland 21031  
(443) 541-8507  
Buddy@lawhjm.com  
Attorney for Petitioner *Lakeside National, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 15, 2019, a copy of the Affidavit of Default was served through the CM/ECF system or first class mailed, postage prepaid to:

**Via CM/ECF Electronic Notice:**

Jeffrey M. Sirody, Counsel for Debtor, Email: [smeyers5@hotmail.com](mailto:smeyers5@hotmail.com)  
Robert S. Thomas, II, Trustee Email: ECF@ch13balt.com

**Via First Class Mail, Postage Prepaid:**

Natalie A. Tao  
877 North Howard Street  
Baltimore, Maryland 21201-4605  
Debtor